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May 6, 2025

The Honorable Pamela A. Barker
Carl B. Stokes United States Courthouse
801 West Superior Avenue, Courtroom 16A
Cleveland, OH 44113-1840

Re: *Sophia Parker Studios, Inc. v. Alice Temperley MBE et al.*
Case No. 1:24-cv-02086-PAB

Dear Judge Barker:

This firm, along with Calfee Halter & Griswold LLP, represent the defendants in the captioned action. Regarding foreign defendants Alice Temperley MBE, Temperley Holdings Ltd., Romo Ltd., the Romo Group Ltd., and Romo (Holdings) Ltd., we have entered an appearance for the limited purpose of contesting Plaintiff's alleged service of process on these foreign defendants and related requests for entry of default judgment against them.

According to Plaintiff's recent filings, Plaintiff purports to have effectuated service on these foreign defendants on April 7, 2025. (Doc. Nos. 31-35.) However, according to Plaintiff's counsel's own sworn declarations, it was not until April 30, 2025, that Plaintiff received any signed, stamped, and sealed Attestation Form from the U.K. Central Authority alleged to comply with Article 6 of the Hague Convention. (Doc. Nos. 36-1 and 37-1.) Thus, no official papers from the U.K. Central Authority were delivered to any of the foreign defendants when they were allegedly served in this case. It is our understanding that this is improper under the relevant requirements for service under the Hague Convention. Thus, these foreign defendants contest the sufficiency of the purported service on them.

Thus, we respectfully request the opportunity to formally respond to Plaintiff's request for entry of default. Being that Plaintiff did not file the returns of service until May 4, 2025,¹ we would respectfully request that our opposition brief be due 21 days later, on May 25, 2025. In addition, if the Court decides that these foreign defendants have in fact been properly served, then we would request an additional opportunity to file motions to dismiss for lack of personal jurisdiction and for failure to state a claim against these foreign defendants. If the Court would

¹ Plaintiff's counsel did not send any official papers from the U.K. Central Authority or the returns of service to us before counsel filed them and the request for entry of default with the Court.

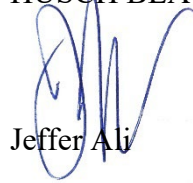
prefer that we bring all these motions at the same time, we are happy to do so. We would request 21 days from the date of any order of the Court regarding the timing of these motions.

Finally, Plaintiff has not purported to have served foreign defendant TMLL Ltd. Thus, we respectfully request that the First Amended Complaint against that foreign entity be dismissed.

We thank the Court for its consideration.

Regards,

HUSCH BLACKWELL LLP

A handwritten signature in blue ink, appearing to read 'Jeffer Ali', is written over the printed name.

Jeffer Ali